## EXHIBIT 2

## **Declaration of Meghan LeFrancois**

- I, Meghan LeFrancois, declare under penalty of perjury the following to be true and accurate to the best of my information and belief:
  - 1. I am an Assistant Federal Public Defender in the Capital Habeas Unit of the Federal Defender for the Western District of Oklahoma. I was on John Grant's legal team. Mr. Grant was executed on October 28, 2021. I was one of the two witnesses Mr. Grant requested to be present for his execution. Julie Gardner, an investigator from my division, was the other person present on his behalf.
  - 2. Julie and I were seated in the front row closest to the wall on the left side of the room when facing the execution chamber. Members of the media were sitting directly behind us, in the second row of seats. They had writing utensils and paper, and I could hear them writing throughout the execution.
  - 3. I believe the curtain was raised at 4:07 or 4:08 p.m. Shortly before the curtain lifted, I heard Mr. Grant yell, "Let's go!" several times.
  - 4. When the curtain was lifted, I saw I was seated towards Mr. Grant's feet on his left side. The Department of Corrections ("DOC") official in the room with Mr. Grant started reading the warrant and Mr. Grant started yelling expletives. The microphone was turned off and he continued yelling. The DOC official stopped reading the warrant. I'm not sure if he stopped reading prematurely or if he had finished. I believe Mr. Grant's eyes were closed throughout all of this. Mr. Grant was wearing his glasses.
  - 5. I could see an IV in his left arm, which was the arm closest to us. At certain points during the execution, I could see fluids (which I assumed were the drugs) flowing in the line.
  - 6. Shortly after the DOC official stopped reading the warrant, I started my stopwatch. Soon thereafter, Mr. Grant raised his head and opened his eyes, maybe right after the drugs started flowing. He looked towards the wall to his right, toward his feet. After a few seconds, he put his head back down and closed his eyes.
  - 7. Shortly after Mr. Grant closed his eyes, it seemed like he began struggling to breathe. About a minute and a half in (I believe), he started vomiting away from us, toward his right side. (I believe shortly before he began vomiting, it looked like he was coughing.) There was a lot of vomit and it appeared to be brown. It was all over his mouth and neck, and it was on the floor.
  - 8. Throughout the first several minutes, Mr. Grant continued struggling to breathe and was gasping for air. Based on his vomiting and gasping, I was worried he was going to choke on his vomit, or already was. I also remember one specific point when Mr. Grant's back lifted dramatically up off the gurney.

- 9. After Mr. Grant first began vomiting, the DOC official who read the warrant picked up a phone that was on the wall (near Mr. Grant's feet) and spoke into it. It's possible he just pressed a button, but I think it was a phone. Some time went by, but eventually a man and woman came in. I think the man was a doctor and the woman was a nurse. Their faces were mostly covered to obscure their identity. They cleaned Mr. Grant's vomit up with a towel and then left.
- 10. Mr. Grant continued vomiting after they left. It was a substantial amount. The doctor and nurse (or possibly just the doctor) came back in, I believe about 6 minutes after I had started my stopwatch. They cleaned him up again, and in the process of doing so, the doctor turned Mr. Grant's face toward our direction and I could see that vomit or something that appeared brown was in his nose. I saw it bubble in his nose as he tried to breathe. The man who I believed to be the doctor turned Mr. Grant's face back toward the opposite wall away from us and finished cleaning him up. After the doctor left, I believe Mr. Grant vomited again, and this time it seemed more liquidy. (It's possible this happened before, not after, the doctor came out the second time.)
- 11. I did not realize when the doctor was wiping him off this last time and turning his face that this was apparently the consciousness check. I only realized that when, shortly after the doctor left the room (I believe around 6.5 minutes after I started my stopwatch), an announcement was made that Mr. Grant was unconscious. He continued to breathe heavily after the announcement was made that he was unconscious. I believe this is when I noticed his cheeks and lips were puffing in and out. Pretty quickly after the announcement that he was unconscious, Mr. Grant's breathing settled down and he became still.
- 12. I remember looking at my stopwatch around the 8-to-8.5-minute mark, and I believe that is when I noticed the last round of drugs flowing.
- 13. About 12.5 minutes after I started my stopwatch, the doctor came back out and did a few different things, seemingly to check if Mr. Grant was alive. I think he checked for a pulse at the neck. He opened and closed Mr. Grant's eyes and then left the chamber. Then the DOC Director came in and announced Mr. Grant was dead.

I declare under penalty of perjury the foregoing is true and accurate to the best of my belief.

Meghan LeFrancois

Date